

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

In Re:

RICHARD AND KAYCE R. GREGORY
a/ka KAYCE R. CAMPBELL
Debtors

RICHARD AND KAYCE R. GREGORY
Movants

vs.

PACIFIC UNION FINANCIAL, LLC

CHARLES J. DEHART, III, ESQUIRE
CHAPTER 13 TRUSTEE

DOVER TOWNSHIP

MAJOR RESTORATION SERVICES
Respondents

Chapter 13

Case No. 1:17-bk-01866

**DEBTORS' ANSWER TO PACIFIC UNION FINANCIAL LLC'S MOTION TO
VACATE ORDER APPROVING SALE**

AND NOW, this 9th day of May 2018, come the Debtors, Richard E. Gregory, Jr. and Kayce R. Gregory, by and through counsel, CGA Law Firm, Brent C. Diefenderfer, Esquire, and do here by Answer the Motion of Pacific Union Financial LLC's Motion to Vacate Order Approving Sale as follows:

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.
5. Admitted.
6. Admitted.

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7. Admitted.
8. Admitted.
9. Denied. Paragraph 9 refers to a legal conclusion for which no response is required.
10. Denied. Paragraph 10 is a legal conclusion for which no response is required. Debtors are without knowledge concerning the position of Pacific Union because Pacific Union did not timely file a response to the Motion to Sell the property.
11. Denied. Paragraph 11 is a legal conclusion for which no response is required. Debtors are without knowledge concerning the position of Pacific Union because Pacific Union did not timely file a response to the Motion to Sell the property.
12. Paragraph 12 is a legal conclusion for which no response is required. Debtors are without knowledge concerning the position of Pacific Union because Pacific Union did not timely file a response to the Motion to Sell the property.
13. Denied. There has been no misrepresentation made. It is undisputed that Pacific Union did not file an Answer to the Motion to Sell. The Court issued notice of any objections to be filed by a date certain. Pacific Union failed to provide an Answer. Pacific Union and its counsel were served with a copy of the Motion to Sell, Notice and Proposed Order.
14. Denied. Paragraph 14 states a legal conclusion for which no response is required.
15. Denied. Paragraph 15 states a legal conclusion for which no response is required.

WHEREFORE, the Debtors request that the Court disapprove Pacific Union's Motion to Vacate Order and grant Debtors Motion to Compel.

Respectfully submitted,

/s/Brent C. Diefenderfer
Brent C. Diefenderfer
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Counsel for Debtors

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CERTIFICATE OF SERVICE

I hereby certify that on May 9, 2018, I electronically filed the foregoing with the Clerk of the Bankruptcy Court using the CM/ECF system, which sent notification of such filing to the following Filing Users:

James C. Warmbrodt, Esq. KML Law Group 701 Market Street, Suite 5000 Philadelphia, Pennsylvania 19106-1532	Charles J. Dehart, III, Esquire 8125 Adams Drive Suite A Hummelstown, PA 17306
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Respectfully submitted,
/s/Brent C. Diefenderfer
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